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## Long Island Rail Road

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April 1, 2020

### Via ECF

United States District Court Judge Ronnie Abrams  
Southern District of New York  
40 Foley Square, Courtroom 1506  
New York, New York 10007

**Re: Brenda Cole v. The Long Island Railroad Company**  
**18-CV-1822 (RA)**

Dear Judge Abrams:

This office represents the Defendant in the above-referenced claim brought under the Federal Employer's Liability Act ("FELA"). I write with the consent of Plaintiff's counsel to request an amendment to the briefing schedule for the summary judgment motion in this matter.

The current briefing schedule provides that: (1) defendant will serve its moving papers on plaintiff by April 3, 2020; (2) plaintiff will serve her opposition papers on defendant by May 15, 2020; and (3) defendant will serve its reply papers and will file all motion papers with the court, by May 29, 2020.

Due to the following circumstances, defendant respectfully requests that all dates be adjourned by one month: (1) I am off from work to care for two quarantined family members with COVID-19, both of whom are elderly and one of whom is in critical condition; and (2) LIRR's legal offices have been ordered closed by the governor for three weeks now, with no non-essential staff, including paralegals and legal secretaries, in the building. Plaintiff's counsel consents to this extension.

Plaintiff's counsel consents to this extension.

This is the first request for an extension of time in this matter.

Defendant thanks the Court for its consideration of this matter.

Respectfully submitted,



Samuel Veytsman, Esq.  
Attorney for defendant

Frederic M. Gold, Esq.  
Attorney for plaintiff

Application granted.

SO ORDERED.



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Ronnie Abrams, U.S.D.J.  
April 2, 2020